REMARKS

Claims 1-9 were examined and reported in the Office Action. Claims 1-9 are rejected. Claim 1 is amended. Claims 1-9 remain.

Applicant requests reconsideration of the application in view of the following remarks.

I. 35 U.S.C. § 102(b)

It is asserted in the Office Action that claims 1-9 are rejected in the Office Action under 35 U.S.C. § 102(b), as being anticipated by U.S. Patent No. 5,648,793, issued to Chen ("Chen"). Applicant respectfully disagrees.

According to MPEP 2131, "'[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.' (Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). 'The identical invention must be shown in as complete detail as is contained in the ... claim.' (Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). The elements must be arranged as required by the claim, but this is not an ipsissimis verbis test, i.e., identity of terminology is not required. (In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990))."

Applicant's amended claim 1 contains the limitations of "[a] method for driving an LCD, comprising: ... driving the LCD by multiple inversion of one of a column, row and pixel, the inversion comprising applying an applied field polarity parameter by signals of the same polarity to two or more adjacent elements selected from the group column, row and pixel, to provide a reduced total fringe field effect to maintain contrast and a minimized flickering on a display."

Applicant's claimed invention includes a method for driving an LCD by signals of the same polarities in two or more adjacent columns, rows or pixels. The driving method is illustrated in Applicant's Figures 16 to 18. With the multiple inversion method and by applying signals of the same polarity to two or more adjacent elements

selected from the group column, row and pixel, flickering in the fringe field effect observed in LCD's is overcome.

Chen discloses a method for driving a LCD including individual inversion of alternate rows and a similar individual inversion method to effect dot inversion. Further, Chen describes the inversion of one field or one dot at a time. Chen, however, does not teach, disclose or suggest multiple inversion is applied to two or more adjacent columns, rows or pixel frames (See, e.g., Chen, column 2, line 65 to column 3, line 7).

The difference between Applicant's claimed multiple inversion method and the method disclosed by Chen is further illustrated by comparing Applicant's Figures 16 to 18 with the row and dot inversion illustrated in Figures 4b and 4c of Chen. In contrast to Figures 4b and 4c of Chen, Applicant's Figures 16 to 18 illustrate that the applied field parameter for driving a liquid crystal display is such that inversion is applied for two (or more) consecutive frames.

Moreover, there wouldn't be any motivation to arrive at Applicant's claimed invention in view of Chen since Chen does not indicate multiple inversion, nor mention any problems that would lead a skilled person in the art to adapt the teaching of Chen to arrive at Applicant's multiple inversion technique. It should be noted that certain alternatives are disclosed in Chen (see, Chen, column 4, lines 26 – 31). Those alternatives, however, relate to the duration of the driving pulses and do not teach, suggest or disclose Applicant's driving method.

Therefore, since Chen does not disclose, teach or suggest all of Applicant's amended claim 1 limitations, Applicant respectfully asserts that a *prima facie* rejection under 35 U.S.C. § 102(b) has not been adequately set forth relative to Chen. Thus, Applicant's amended claim 1 is not anticipated by Chen. Additionally, the claims that depend directly or indirectly on claim 1, namely claims 2 -9, are also not anticipated by Chen for the above same reason.

Accordingly, withdrawal of the 35 U.S.C. § 102(b), rejections for claims 1-9 is respectfully requested.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending, namely 1-9, patentably define the subject invention over the prior art of record and are in condition for allowance and such action is earnestly solicited at the earliest possible date.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR, & ZAFMAN

Dated: May 21, 2004

By: _____
Steven Laut, Reg. No. 47,736

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, California 90025
(310) 207-3800

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail with sufficient postage in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia 22313-1450 on May 21, 2004.

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Jean Svoboda